EXHIBIT

From:

Bryan Aylstock <BAylstock@awkolaw.com>

Sent:

Tuesday, March 31, 2015 10:29 AM

To:

Balefsky, Lee; Adam Slater; Tom P. Cartmell; Ben Anderson;

Rich@freeseandgoss.com

Cc:

Tiger, Michelle

Subject:

Re: Ethicon TVM Phila cases

That's great news!!!

Sent from my HTC One on the Verizon Wireless 4G LTE network

---- Reply message -----

From: "Balefsky, Lee" <Lee.Balefsky@KlineSpecter.com>

To: "Bryan Aylstock" <BAylstock@awkolaw.com>, "'Adam Slater'" <aslater@mskf.net>, "Tom P. Cartmell (tcartmell@wcllp.com)" <tcartmell@wcllp.com>, "Ben Anderson" <Ben@andersonlawoffices.net>, "Rich

Freese (Rich@freeseandgoss.com)" <Rich@freeseandgoss.com> Cc: "Tiger, Michelle" <Michelle.Tiger@KlineSpecter.com>

Subject: Ethicon TVM Phila cases Date: Tue, Mar 31, 2015 9:24 AM

Guys: we just received a great ruling from J. New in the Philly mass tort program denying Ethoicon/J and J motions to dismiss for lack of jurisdiction. That means eight (8) trials, scheduled to begin in Nov, will move forward. Our first set of expert reports are due June 18th. Can we set up a meeting or call to discuss what generic experts /reports we should use in these cases. We can discuss the details later but they involve the Prolift, TVT Retropubic, TVT Secure and Gynemesh. I will be in Vegas for the PSC meeting if it makes sense to meet then . . otherwise we can schedule a call for next week . Thanks, Lee

From:

Rich Freese <Rich@freeseandgoss.com>

Sent:

Tuesday, March 31, 2015 10:32 AM

To:

Balefsky, Lee; Bryan Aylstock; 'Adam Slater'; Tom P. Cartmell

(tcartmell@wcllp.com); 'Ben Anderson'

Cc:

Tiger, Michelle

Subject:

Re: Ethicon TVM Phila cases

That's great, Lee. I'm available for a conf call to discuss. Rich

From: <Balefsky>, Lee Balefsky <<u>Lee.Balefsky@KlineSpecter.com</u>>

Date: Tuesday, March 31, 2015 9:24 AM

To: "baylstock@awkolaw.com" < baylstock@awkolaw.com >, Adam Slater < aslater@mskf.net >, Tom Cartmell <tartmell@wcllp.com>, Ben <Ben@andersonlawoffices.net>, Richard Freese <rich@freeseandgoss.com>

Cc: "Tiger, Michelle" < Michelle. Tiger@KlineSpecter.com>

Subject: Ethicon TVM Phila cases

Guys: we just received a great ruling from J. New in the Philly mass tort program denying Ethoicon/J and J motions to dismiss for lack of jurisdiction. That means eight (8) trials , scheduled to begin in Nov, will move forward. Our first set of expert reports are due June 18th. Can we set up a meeting or call to discuss what generic experts /reports we should use in these cases. We can discuss the details later but they involve the Prolift, TVT Retropubic , TVT Secure and Gynemesh. I will be in Vegas for the PSC meeting if it makes sense to meet then . . otherwise we can schedule a call for next week . Thanks , Lee

From:

Bryan Aylstock <BAylstock@awkolaw.com>

Sent:

Wednesday, April 08, 2015 12:15 PM

To:

Specter, Shanin; Adam Slater

Cc:

Balefsky, Lee; Kline, Thomas R.; Tiger, Michelle

Subject:

Re: Philadelphia TVM Status Conf 4/8/15

Excellent!

Sent from my HTC One on the Verizon Wireless 4G LTE network

---- Reply message ----

From: "Specter, Shanin" < Shanin. Specter@KlineSpecter.com>

To: "'aslater@mskf.net'" <aslater@mskf.net>, "Bryan Aylstock" <BAylstock@awkolaw.com>

Cc: "Lee Balefsky (External)" <Lee.Balefsky@KlineSpecter.com>, "Kline, Thomas R." <Tom.Kline@KlineSpecter.com>,

"Tiger, Michelle" < Michelle. Tiger @ Kline Specter.com >

Subject: Philadelphia TVM Status Conf 4/8/15

Date: Wed, Apr 8, 2015 9:55 AM

New was very strident.

It seems that New and Goodwin are talking. New appears to be doing Goodwin's bidding, which may explain why he denied the motions to dismiss for lack of jurisdiction.

From: Adam Slater [mailto:aslater@mskf.net] Sent: Wednesday, April 08, 2015 11:51 AM

To: Tiger, Michelle

Cc: Bryan Aylstock <BAylstock@awkolaw.com>; Balefsky, Lee; Specter, Shanin; Kline, Thomas R.

Subject: Re: Philadelphia TVM Status Conf 4/8/15

Wow. Sounds solid.

Adam M. Slater

Mazie Slater Katz & Freeman

Sent from my iPhone

On Apr 8, 2015, at 11:14 AM, Tiger, Michelle < Michelle. Tiger@KlineSpecter.com > wrote:

Hi Bryan and Adam -

FYI, we had a very interesting conference with J. New this morning in the Philly TVM Mass Tort Program. This was our first conference since the Judge denied Ethicon's Motion to Dismiss/Preliminary Objections regarding Jurisdiction.

We now have 7 cases listed for trial. The first one will be Hammons (Prolift) on December 7, 2015. (Hansen – a Gynemesh case - will be moved to the spot previously held by Matthews, which will be dismissed. A new CMO for Hansen will be forwarded to J. New today. The new Hansen trial date is March 7, 2016.)

- J. New then asked for a status of 'discussions.' LBB and SS reported that discussions have started with all defendants, except for Ethicon. Julie Callsen confirmed to Judge New that Ethicon was not participating in any settlement discussions with anyone.
- J. New then turned to Ethicon's counsel and told them it is time to begin discussions "It is time to sit down and begin discussions to resolve these cases." He said, "You know the verdicts." "Don't push your luck." "You don't need more time." He told them to take a hard look at the cases and get them resolved. He also told them that he would "make it tough for them." He ordered a report on the status of discussions by the next monthly meeting on May 4th. Before we left, he looked at Ethicon's counsel and said, "I'm serious."

Michelle

Michelle L. Tiger, Esquire

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From:

Ben Anderson <Ben@andersonlawoffices.net>

Sent:

Tuesday, March 31, 2015 10:56 AM

To:

Rich Freese

Cc:

Balefsky, Lee; Bryan Aylstock; Adam Slater; Tom P. Cartmell

(tcartmell@wcllp.com); Tiger, Michelle

Subject:

Re: Ethicon TVM Phila cases

Same here. And awesome news, Lee.

Benjamin H. Anderson, Esq. Anderson Law Offices 1360 W 9th Street Suite 215

Cleveland OH 44113

o: 216.589.0256

c: <u>216.513.8755</u>

f: <u>216.916.0988</u>

e: ben@andersonlawoffices.net

On Mar 31, 2015, at 10:31 AM, Rich Freese < Rich@freeseandgoss.com > wrote:

That's great, Lee. I'm available for a conf call to discuss. Rich

From: <Balefsky>, Lee Balefsky <Lee.Balefsky@KlineSpecter.com>

Date: Tuesday, March 31, 2015 9:24 AM

To: "bayIstock@awkolaw.com" < bayIstock@awkolaw.com > , Adam Slater < aslater@mskf.net > , Tom

Cartmell <tcartmell@wcllp.com>, Ben <Ben@andersonlawoffices.net>, Richard Freese

<rich@freeseandgoss.com>

Cc: "Tiger, Michelle" < Michelle. Tiger@KlineSpecter.com >

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Seat A